

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

CONSERVATION LAW
FOUNDATION, Inc.,

Plaintiff,

v.

EXXONMOBIL CORPORATION,
EXXONMOBIL OIL CORPORATION, and
EXXONMOBIL PIPELINE COMPANY,

Defendants.

No. 16-cv-11950 (MLW)

The Honorable Mark L. Wolf

JOINT MOTION FOR LEAVE TO FILE EXCESS PAGES

Pursuant to Local Rule 7.1(b)(4), Defendants Exxon Mobil Corporation, ExxonMobil Oil Corporation and ExxonMobil Pipeline Company (collectively “Defendants” or “ExxonMobil”) and Plaintiff Conservation Law Foundation (“CLF” or Plaintiff) respectfully request that this Court grant Defendants leave to file a Memorandum not to exceed thirty-five (35) pages in support of Defendants’ Motion to Dismiss the Complaint and grant Plaintiff leave to file an Opposition Memorandum not to exceed twenty-seven (27) pages in the above-captioned action. Defendants’ Motion to Dismiss is due on December 6, 2016 and Plaintiff’s Opposition is due fourteen days later. In support thereof, the parties state:

1. Plaintiff CLF filed a 70-page, 295-paragraph complaint, asserting 14 causes of action. The complaint advances multiple theories of liability under two different, complex environmental statutes—the Resource Conservation and Recovery Act (“RCRA”) and the Clean Water Act (“CWA”).

2. On or before December 6, 2016, Defendants will move to dismiss the Complaint in its entirety under multiple theories of dismissal. After endeavoring to streamline its Memorandum of Law to the extent possible, Defendants believe that fifteen (15) excess pages, for a total number of pages not to exceed thirty-five (35) pages, are necessary to analyze the substantive and procedural issues in this case.

3. Plaintiff CLF assents to Defendants' request and requests the court grant seven (7) excess pages, for a total number of pages not to exceed twenty-seven (27) pages, in order to adequately address the legal arguments raised by the Complaint and Defendants' Motion to Dismiss. Defendants assent to Plaintiff's request.

Dated: November 11, 2016

Respectfully submitted,

EXXON MOBIL CORPORATION,
EXXONMOBIL OIL CORPORATION, and
EXXONMOBIL PIPELINE COMPANY

and

CONSERVATION LAW FOUNDATION, INC.

By their attorneys,

By: /s/ Deborah E. Barnard

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CERTIFICATE OF SERVICE

I hereby certify that a true copy of the above document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing and paper copies will be sent to those indicated as non-registered participants.

/s/ Deborah E. Barnard

Deborah E. Barnard